

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS SUPPLEMENTAL  
BRIEF IN SUPPORT OF ITS MOTION  
TO COMPEL UBER SOURCE CODE**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal (“Waymo’s Administrative Motion”) confidential information in its Supplemental Brief in  
8 Support of its Motion to Compel Uber Source Code (Waymo’s Brief”). Waymo’s Administrative  
9 Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Brief	Highlighted in blue	Defendants
	Highlighted in green	Waymo
Exhibit 1 to Waymo's Brief	Entire document	Defendants
	Highlighted in green	Waymo
Exhibit 2 to Waymo's Brief	Entire document	Defendants
	Highlighted in green	Waymo
Exhibit 3 to Waymo's Brief	Entire document	Waymo & Defendants

16 3. Waymo’s Brief and exhibits thereto contain information that Defendants have  
17 designated as confidential and/or highly confidential.

18 4. Portions of Waymo’s Brief and exhibits thereto also contain or refer to Waymo’s trade  
19 secrets. These portions, which Waymo seeks to seal, contain, reference, and/or describe Waymo’s  
20 asserted trade secrets, including source code. I understand that these trade secrets are maintained as  
21 secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31).  
22 The public disclosure of this information would give Waymo’s competitors access to in-depth  
23 descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. If such  
24 information were made public, I understand that Waymo’s competitive standing would be  
25 significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential  
26 information.  
27  
28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on October 14, 2017.

## SIGNATURE ATTESTATION

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Charles K. Verhoeven